

Colleen A. Sorrell, Esq.  
Charles D. Tobin, Esq. (Of Counsel)  
HOLLAND & KNIGHT LLP  
195 Broadway  
New York, New York 10007  
Tel.: (212) 513-3200  
Fax: (212) 385-9010

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROSS WEIL and BRETT ROYCE,  
Plaintiffs,

- against -

AMERICAN UNIVERSITY,  
Defendant.

Hon. Deborah A. Batts

07 Civ. 7748

**NOTICE OF MOTION FOR PRO  
HAC VICE ADMISSION OF  
CHARLES D. TOBIN**


**PLEASE TAKE NOTICE THAT**, upon the annexed Affidavit of Colleen A. Sorrell and Verified Petition of Charles D. Tobin, the undersigned will move this Court before the Honorable Deborah A. Batts, U.S.D.J., at the United States Courthouse, 500 Pearl Street, Courtroom 2510, New York, New York 10007, at a date and time to be set by the Court, for an Order pursuant to the Local Rules for the United States District Court for the Southern District of New York granting *pro hac vice* admittance of Charles D. Tobin to the bar of the Court and permitting him to serve as co-counsel for the defendant, American University, in the above-captioned case.

A proposed form of Order is attached hereto.

Dated: October 15, 2007

Respectfully submitted,

HOLLAND & KNIGHT LLP

By:   
Colleen A. Sorrell  
Charles D. Tobin (Of Counsel)  
195 Broadway  
New York, New York 10007  
(212) 513-3200  
(212) 385-9010  
*Attorneys for Defendant*

Colleen A. Sorrell, Esq.  
Charles D. Tobin, Esq. (Of Counsel)  
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**AFFIDAVIT OF COLLEEN A.  
SORRELL IN SUPPORT OF PRO  
HAC VICE ADMISSION OF  
CHARLES D. TOBIN**

**COLLEEN A. SORRELL**, being duly sworn, deposes and says:

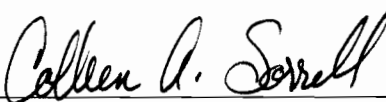
1. I am an associate with the firm of Holland & Knight LLP, attorneys for defendant, American University.
2. I am submitting this Affidavit in support of the application of Charles D. Tobin for admission to this Court *pro hac vice*.
3. I was admitted to practice in the courts of the State of New York and the Southern District of New York in 2003. I am a member in good standing of the bar of each of those courts.
4. Mr. Tobin is a partner with Holland & Knight LLP in our Washington, D.C. office who specializes in media and communications law. He will act as co-counsel in this case.

5. Mr. Tobin is a member in good standing of the Bar of the District of Columbia having been admitted to that bar in 1997. A certificate of good standing from the Bar of the District of Columbia is attached to Mr. Tobin's Verified Petition as Exhibit A.

6. Mr. Tobin is a member in good standing of the Bar of the State of Florida, having been admitted to that bar in 1989. A certificate of good standing from the State Bar of Florida is attached to Mr. Tobin's Verified Petition as Exhibit B.

WHEREFORE, I respectfully request that Charles D. Tobin be permitted to appear as counsel and advocate in the above-captioned matter *pro hac vice*.

Dated: New York, New York  
October 15, 2007

  
Colleen A. Sorrell

Sworn to before me on  
this 15 day of October, 2007

  
Notary Public

**Elvin Ramos**  
Notary Public, State of New York  
NO. 01RA4870243  
Qualified in Queens County  
Certificate filed in New York County  
Commission Expires September 2, 2010

Colleen A. Sorrell, Esq. (Bar No. 4142279)  
Charles D. Tobin, Esq. (*Pro Hac Vice*)  
HOLLAND & KNIGHT LLP  
195 Broadway  
New York, New York 10007  
Tel.: (212) 513-3200  
Fax: (212) 385-9010

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**VERIFIED PETITION FOR PRO  
HAC VICE ADMISSION OF  
CHARLES D. TOBIN**

**CHARLES D. TOBIN**, being duly sworn, deposes and says:

1. I am a partner in the law firm of Holland & Knight LLP, attorneys for the defendant, American University. My business address is Holland & Knight LLP, 2099 Pennsylvania Ave., Suite 100, Washington, D.C. 20006.

2. I was admitted to practice in the courts of the District of Columbia in 1997. A certificate of good standing issued by the District of Columbia Court of Appeals Committee on Admissions is attached hereto as Exhibit A.

3. I was admitted to practice in the courts of the State of Florida in 1989. A certificate of good standing issued by the Supreme Court of Florida is attached hereto as Exhibit B.

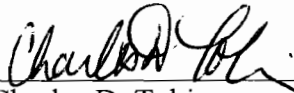
4. I have not been the subject of any disciplinary proceeding before any court or administrative body.

5. I certify that I have read and am familiar with the Local Rules of this District and the Federal Rules of Civil Procedure.

6. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, in view of the foregoing, and pursuant to Local Civil Rule 1.3(c), I respectfully request that the Court permit me to appear and participate in the above-entitled case *pro hac vice* as co-counsel for the defendant, American University.

Dated: Washington, D.C.  
October 10, 2007

  
Charles D. Tobin



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

CHARLES DAVID TOBIN

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was on the 8<sup>TH</sup> day of AUGUST, 1997  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on October  
10, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

# Supreme Court of Florida

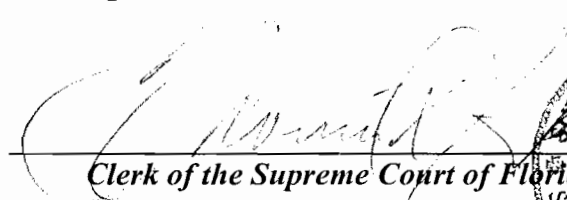
## Certificate of Good Standing

*I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do hereby certify that*

**CHARLES DAVID TOBIN**

*was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on September 20, 1989, is presently in good standing, and that the private and professional character of the attorney appear to be good.*

*WITNESS my hand and the Seal of the  
Supreme Court of Florida at Tallahassee,  
the Capital, this October 8, 2007.*

  
Clerk of the Supreme Court of Florida.





Colleen A. Sorrell, Esq.  
Charles D. Tobin, Esq. (Of Counsel)  
HOLLAND & KNIGHT LLP  
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New York, New York 10007  
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**CERTIFICATE OF SERVICE**

I hereby certify, pursuant to Title 28 U.S.C. § 1746, that on October 15, 2007, I served a copy of the Notice of Motion for Pro Hac Vice Admission of Charles D. Tobin with supporting papers, and Proposed Order Granting Pro Hac Vice Admission of Charles D. Tobin, by first class mail to:

Michael A. Kaufman, Esq.  
Michael A. Kaufman, P.A.  
570 Lexington Avenue, 44<sup>th</sup> Floor  
New York, New York 10022

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 15, 2007.

  
Colleen A. Sorrell  
Holland & Knight LLP  
195 Broadway  
New York, New York 10007